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December 30, 2014

TO: Each Supervisor

FROM: Cynthia A. Harding, M.P.H.
Interim Director

SUBJECT: **QUARTERLY REPORT – WATER QUALITY MONITORING OF SMALL WATER SYSTEMS**

On November 29, 2011, on a motion by Supervisor Michael D. Antonovich, the Department of Public Health (DPH) was instructed to provide quarterly reports on its water quality monitoring of small water systems. Attached is the quarterly report covering the period July 1 through September 30, 2014. The report summarizes water quality findings in small water systems throughout the County and outlines the actions taken by the DPH Environmental Health Division in response to these findings.

The DPH Drinking Water Program received one-time State funding to improve the small water systems program and is working with the State to improve the monitoring and reporting of these water systems. To this end, the Environmental Health Division (EH) has initiated the implementation of EnvisionConnect (EC), the Division's new inspection and permit management system, to enhance the water quality monitoring and reporting capabilities for small water systems. Thus far, the DPH Drinking Water Program has entered the inventory of small water systems into EC, and has been entering lab results into EC. Currently, the DPH Drinking Water Program is configuring the inspection capability of EC with parameters specific to Los Angeles County (including: data conversion, violations, enforcement actions, codes, and an inspection report), a process that is targeted for completion by the fourth quarter of Fiscal Year 2014-15. As a result, the DPH Drinking Water Program will not have the capability to generate a quarterly report until after the inspection capability of EC is implemented. Therefore, the next quarterly report will be for the time period of April to June 2015 and will be submitted to the Board in August 2015.

If you should have any questions in the interim, please let me know.

CAH:vp
PH:1111:009

Attachment

c: Interim Chief Executive Officer
County Counsel
Acting Executive Officer, Board of Supervisors

Quarterly Report on Water Quality Monitoring for Small Water Systems in Los Angeles County

July 1 through September 30, 2014

BACKGROUND

On July 13, 2010, the County of Los Angeles Board of Supervisors (Board) instructed the Environmental Toxicology Laboratory of the Department of Agricultural Commissioner/Weights and Measures to conduct an expanded study of the small well water facilities in the County of Los Angeles to determine the presence of Arsenic, Total Chromium, Hexavalent Chromium (chromium+6), and Lead as a follow-up study to an earlier study published on February 14, 2001.

The Los Angeles County Department of Public Health Drinking Water Program (DPH-DWP) serves as the local enforcement agency for California's Drinking Water Standards applicable to "small water systems" in Los Angeles County. A small water system is defined by the California Department of Public Health (CDPH) as a system that has less than 200 service connections. The DPH-DWP currently inspects 189 small water systems within the County.

Operators of each small water system are required to complete bacteriological and chemical analyses of their potable water supplies, and to report monitoring results to the DPH-DWP at frequencies established by the CDPH. Failure to take water samples or to properly report sampling data constitutes a violation of State law enforceable by the DPH-DWP.

When water quality test results indicate that either (a) the system does not meet State Drinking Water Standards, or (b) an immediate health risk is present, the water system operator is required to: 1) notify consumers immediately, and 2) take corrective action to achieve compliance with State Drinking Water Standards. When the level of a chemical contaminant exceeds ten times the State Drinking Water Standard, the operator must discontinue water service and provide an alternative source of drinking water to consumers.

The DPH-DWP works with the CDPH to enforce State law and to assist the water system in addressing violations for any chemical contaminant exceeding the State's Drinking Water Standards. Once a Notice of Violation is issued and consumers are notified of the exceedance, the water system is placed under increased surveillance while public notices continue to be posted. The DPH-DWP continues to educate and work with the water system regarding the installation of treatment systems, as well as the consideration of new water sources. Additionally, the DPH-DWP works with system operators in applying for financial assistance from the CDPH to address identified violations.

On November 29, 2011, the Board instructed the County of Los Angeles Department of Public Health to prepare quarterly reports on water quality monitoring in order for the Board to stay informed of current water quality issues. This report covers the period July 1 through September 30, 2014.

BACTERIOLOGICAL/MICROBIOLOGICAL WATER QUALITY

A. Bacteriological Sampling Requirement

The DPH-DWP issues corrective orders to small water systems for failing to perform bacteriological analyses at the frequency required by State law. The DPH-DWP issued Notice of Violation and Order to four water systems for lapses in bacteriological sampling during the reporting period.

Table 1: Small Water Systems in Violation of State Requirements to Perform Bacteriological Analyses.

System ID	Small Water System	City
1907036	NEW APOSTOLIC CHURCH	SAUGUS
1900061	AGUA DULCE WOMAN'S CLUB	AGUA DUCLE
1900750	DEL SUR	LANCASTER
1900011	CAMP SCOTT AND SCUDDER	SANTA CLARITA

The DPH-DWP has notified each water system to ensure that water samples are collected immediately. The DPH-DWP continues to educate and provide assistance when financially disadvantaged water systems are unable to test their water.

B. Exceedances of the Bacteriological Standard

The DPH-DWP also issues corrective orders to small water systems for exceeding the State's Bacteriological Standard. The DPH-DWP issued five Notices of Violation and Order for bacteriological exceedances during the reporting period.

Table 2: Small Water Systems in Violation of the State's Drinking Water Standards for Bacteriological Levels.

System ID	Small Water System	City
1900061	AGUA DULCE WOMEN'S CLUB	AGUA DULCE
1900007	CALIFORNIA CONSERVATION CAMP #14	SAUGUS
1900553	WILLIAMS S HART UNION HIGH / PLACERITA JUNIOR HIGH SCHOOL	NEWHALL
1900912	GORMAN ELEMENTARY SCHOOL	GORMAN
1907018	SUMMERHILL EQUESTRIAN CENTER	SAUGUS

All five water systems initially tested positive for coliform bacteria, an indicator used to signal the potential presence of *E. coli*, a potential pathogen. Follow-up analyses did not detect the presence of *E. coli*, and neither coliform bacteria nor *E. coli* have been detected in subsequent testing of these small water systems.

C. Microbiological Treatment Requirement

Small water systems are designated as “Surface Water Systems” when they use water from streams, lakes, and open reservoirs. Similarly, small water systems are designated as “Groundwater Systems Under the Direct Influence of Surface Water” (GWUDI) when their wells are in close proximity to such features. Effective July 1, 2014, the regulatory oversight of small water systems designated as Surface Water was transferred from DPH-DWP to the State Water Resources Control Board, Division of Drinking Water.

Table 3: Small Water Systems Designated as Surface Water for which the Regulatory Oversight has been Transferred to the State Water Resources Control Board.

System ID	Small Water System	City
1909644	AZUSA SPRINGS WATER SYSTEM	AZUSA
1900569	TRASK SCOUT RESERVATION	MONROVIA
1900764	HENNINGER FLATS	ALTADENA
1900937	USFS – PYRAMID LAKE S-14	GORMAN

Small water systems designated as GWUDI remain under the jurisdiction of the DPH-PWP. These small water systems are required to implement “multibarrier treatment,” an enhanced preventative measure against potential contamination.

Table 4: Small Water Systems Designated GWUDI That Have Not Met the Microbiological Treatment Requirements.

System ID	Small Water System	City
1900904	ACTON CONSERVATION CAMP 11	ACTON
1900007	CALIFORNIA CONSERVATION CAMP 14	SAUGUS
1900901	FIRE SUPPRESSION CAMP 19	AZUSA
1900591	STURTEVANT CAMP, UNITED METHODIST	LA CANADA FLINTRIDGE

During the reporting period, the DPH-DWP maintained increased surveillance at four small water systems that have previously been notified regarding their designation as GWUDI Systems but have not completed full implementation of multibarrier treatment. The DPH-DWP is continuing to work with these water systems to develop and implement multibarrier treatment systems.

CHEMICAL WATER QUALITY

A. Exceedances of the Arsenic Standard

Effective January 2006, small water systems designated as “community water systems” and “non-community non-transient water systems” were required to comply with the Arsenic Maximum Contaminant Level (MCL) of 10 parts per billion. The Arsenic MCL is not applicable to small water systems designated as “transient non-community water systems.”

During the reporting period, the DPH-DWP maintained increased surveillance at six small water systems that have previously been notified regarding Arsenic levels historically exceeding the State Standard.

Table 5: Small Water Systems Under Increased Surveillance for Chronic Exceedance of the State's Drinking Water Standard for Arsenic.

System ID	Small Water System	City
1900305	CHALLENGER MEMORIAL YOUTH CAMP	LANCASTER
1900038	LANCASTER PARK MOBILE HOME PARK	LANCASTER
1900100	METTLER VALLEY MUTUAL	LANCASTER
1900785	MITCHELL'S AVENUE E MOBILE HOME PARK	LANCASTER
1900520	SMITH'S VILLAGE MOBILE HOME PARK	LANCASTER
1900961	WINTERHAVEN MOBILE ESTATES	LANCASTER

The water treatment proposals and efficacy for the systems listed above require additional information. The DPH-DWP has extended the review period until March 2015 and will continue to work with the water systems until final approval. In the interim, DPH-DWP has directed these facilities to post Public Notices informing consumers of the elevated levels of Arsenic.

Table 6: Small Water Systems Whose Designation is Under Review To Determine Whether Compliance with the State's Drinking Water Standard for Arsenic is Required.

System ID	Small Water System	City
1900894	ACTON FOUR SQUARE CHURCH	ACTON
1900987	U.S. FOREST SERVICE OAK FLATS S-13	CASTAIC
1907007	NORTH HOLLYWOOD SPORTSMEN'S CLUB	SAUGUS
1907031	RANCHO YBARRA CHRISTIAN CAMP	TUJUNGA
1907036	NEW APOSTOLIC CHURCH BOUQUET CANYON	SAUGUS
1907018	SUMMERHILL EQUESTRIAN CENTER	SAUGUS

A recent review by the State Water Resources Control Board, Drinking Water Division has classified the water systems identified above as "transient non-community." According to Title 22, Section 64432(A), only community and non-transient non-community water systems are required to monitor for Arsenic MCL. Further review is necessary to determine if the Arsenic MCL is applicable to these six small water systems.

B. Exceedances of the Nitrate Standard

During the reporting period, the DPH-DWP maintained increased surveillance at two small water systems that have previously been notified regarding Nitrate levels historically exceeding the State Standard (45 parts per million). These small water systems are also required to continue notification to their customers.

Table 7: Small Water Systems under Increased Surveillance for Chronic Exceedance of the State's Drinking Water Standard for Nitrate.

System ID	Small Water System	City
1900894	ACTON FOUR SQUARE CHURCH	ACTON
1907036	NEW APOSTOLIC CHURCH BOUQUET CANYON	SAUGUS

Since the water treatment proposals and system efficacy require additional information, DPH-DWP has extended the review period until March 2015 and will continue to work with these two small water systems until final approval. In the interim, DPH-DWP has directed the facilities to post a Public Notice informing the members of the churches about the elevated levels of Nitrate and that an alternative water supply is being provided while the system is under review.

SUMMARY

Four small water systems were cited during the reporting period for failing to perform the necessary bacteriological analyses. Five small water systems were cited for exceeding the Bacteriological Standard during this period. Increased surveillance and public notification continued at four small water systems designated as GWUDI. Increased surveillance and public notification continued at six small water systems with historical Arsenic exceedances. Six small water systems with historical Arsenic exceedances are under a review of their classification to determine whether the Arsenic MCL is applicable to their classification. Increased surveillance and public notification continued at two small water systems with historical Nitrate exceedances.

A quarterly report will not be submitted until August 2015 to provide the DPH-DWP necessary time to enhance the monitoring and reporting of small water systems. The DPH-DWP received one-time State funding to improve the small water systems program and is working with the State to improve the monitoring and reporting of these water systems. To this end, the DPH-DWP has initiated the implementation of EnvisionConnect (EC), the Environmental Health Division's new inspection and permit management system for small water systems. Thus far, the DPH-DWP has entered the inventory of small water systems into EC, and has been entering lab results into EC. Currently, the DPH Drinking Water Program is configuring the inspection capability of EC with parameters specific to Los Angeles County (including: violations, codes, and an inspection report), a process that is targeted for completion by the fourth quarter of Fiscal Year 2014-15. As a result, the DPH-DWP will not have the capability to generate a quarterly report until after the inspection capability of EC is implemented. Therefore, the next quarterly report will provide information for the time period of April to June 2015, and will be submitted in August 2015.

For questions or for further information, please contact Veronica Petrosyan, Chief Environmental Health Specialist of Program Development, at (626) 430-5214.